CERTIFICATION OF CPNI FILING DATED DECEMBER 31, 2005

EB-06-TC-060

On behalf of Threshold Communications, Inc. ("Threshold") and in accordance with Section 64.2009(e) of the Commission's Rules, I hereby certify that I have personal knowledge that Threshold has established operating procedures that are adequate to ensure compliance with the rules in Section 64.2009.

Further, I hereby certify that the attached statement explaining how the company's operating procedures ensure compliance with Section 64.2009 is true and correct.

Dated this 5th day of February, 2006.

Threshold Communications, Inc.

By:		_
Name:		
	 _	
Title:		_
Date:		

Statement Concerning the Protection of Customer Proprietary Network Information for the Annual Period Ending December 31, 2005

- 1. Threshold Communications, Inc. is a telecommunications carrier subject to the requirements set forth in Section 64-2009 of the Commission's rules.
- 2. Pursuant to said rules, Threshold has established a system by which they can determine whether a customer has given their approval for the release or use of said customer's proprietary network information ("CPNI") prior to that information being used or released.
- 3. Information protected by Threshold includes information that relates to the quantity, technical configuration, type, destination, location and amount of use of a telecommunications service subscribed to by a customer and made available to Threshold by the customer solely by virtue of the carrier-customer relationship. Also protected is information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer.
- 4. Threshold personnel are trained as to when they are and are not authorized to release or use CPNI and violation of these rules will subject personnel to express disciplinary action.
- 5. Threshold maintains a record of its' sales and marketing campaigns that use customers' CPNI. Further, record of all instances where CPNI was disclosed or provided to third parties or third parties were allowed access to CPNI is maintained by Threshold. These records reflect a description of the campaigns, the specific CPNI used in the campaign and what products or services were offered as part of the campaign. These records are retained for a minimum of one year.
- 6. Threshold has established a procedure whereby all sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval of the use of CPNI and records reflecting carrier compliance with the Commission Rules are maintained for a minimum of one year.